

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Wildfire Mitigation Plans Discovery 2022**  
**Data Response**

PG&E Data Request No.:	WilliamBAbrams_002-Q24		
PG&E File Name:	WMP-Discovery2022_DR_WilliamBAbrams_002-Q24		
Request Date:	April 13, 2022	Requester DR No.:	Email Transmittal – 2022WMP DR-02
Date Sent:	April 25, 2022	Requesting Party:	William B. Abrams
PG&E Witness:		Requester:	Will Abrams

**SUBJECT: PG&E WMP GAP ANALYSIS GIVEN KINCADE FIRE TESTIMONY AND SAFETY IMPLICATIONS**

Expert Testimony: Mr. Gary Uboldi, Fire Captain Specialist Peace Officer with the California Department of Forestry and Fire Protection who has investigated over 400 wildfires across his 20+ year career

Expert Testimony: Mr. Joseph Hemstock, 38 Year as PG&E as Supervisory Inspector, Crew Foreman, Electrical Transmission Supervisor and other lead roles plus 10 years as PG&E consultant

Testimony Date: February 9, 2022 (See Attachment B: Pre-Trial Transcript)

**BACKGROUND TESTIMONY/EVIDENCE:**

Pg. 232 (lines 8-19)

“Q. Okay. That area that you identified as the specific origin area, PG&E does not own that land, does it? A. No. Q. In fact, this tower, 1 over 6, the tower is located like 200 yards behind a gate, isn't it? A. That's a rough estimation, but yeah. I would say, yeah. Q. That gate is controlled by CalPine, right? A. I believe so. Q. CalPine is the owner of the plant, right? A. Yes.

**QUESTION 24**

How has PG&E improved their policies and wildfire mitigation practices to more closely work with partners like CalPine to ensure access and maintenance issues do not impact safe operations of PG&E equipment?

**ANSWER 24**

There is no allegation and no evidence that PG&E has had any problems or “issues” obtaining necessary access to its equipment from Calpine or that any such issues contributed to the Kincade Fire.